

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

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Mr. Jason Davis The Law Offices of Davis & Associates 41593 Winchester Road, Suite 200 Temecula, California 92590

Mr. Davis:

This is in reference to your correspondence, with enclosed samples, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB). In your letter, you asked for a classification of an AR10-type item identified by you as a "WARRHOGG BLANK" as well as a Glock-type "GC9 Blank" on behalf of your client, Polymer 80, Incorporated (see enclosed photos). Specifically, you wish to know if these items would be classified as a "firearm" under the Gun Control Act of 1968 (GCA).

You state the submitted WARRHOGG BLANK incorporates the following design features:

- Magazine well.
- Magazine catch.
- Receiver extension/buffer tube.
- Pistol grip area.
- Pistol-grip screw hole.
- Pistol grip upper receiver tension hole.
- Pistol grip tension screw hole.
- Bolt catch.
- Front pivot-pin takedown hole.
- Rear pivot-pin takedown hole.

As a part of your correspondence, you describe design features and the manufacturing process of the submitted "WARRHOGG Blank" to include the following statements: